

## Comment on FCC Docket: RM-11306

Although I filed another comment on this docket, I felt it was useful to file a second comment. This comment primarily addresses the “reply comments” filed by the ARRL.

I believe the ARRL’s comments clearly demonstrate that it does not listen to the Amateur Radio Community. Instead, the ARRL makes unsubstantiated assertions about what “is demanded” to be done. In fact, the ARRL seems to be only comfortable with “demanding” and not with broad participation by the amateur radio community in developing positions on issues “like regulation by bandwidth.” The ARRL seems to be comfortable with “demanding” that the FCC act as it commands, whether associated with BPL or the bandwidth management plan.

The ARRL’s assertion that its plan to open all of the amateur bands to “semiautomatic operation” is “middle ground” is totally unjustified and not substantiated in any way. This proposal could radically alter the usage of the HF amateur radio bands. The proposal is “so radical” that it runs counter regional bandplans to limit the usage of “automatic and semiautomatic” HF data servers.

The ARRL’s assertion that “it as an organization” has the standing in the amateur radio community to coordinate a bandplan – and to have it accepted by the amateur community – is totally unfounded. It doesn’t even have membership numbers to support this, not including the fact that many of its members do not support this proposal.

The ARRL’s assertion that the only way to increase the available bandwidth for digital communications is to open all parts of all bands to digital communications modes is totally unsubstantiated. It may be desirable to change the mode of band regulation to bandwidth, but that does not require opening all of the bandwidth of all of the bands to digital communications modes. It is clear that the proposed digital mode operation will require significant new equipment for amateurs to even determine whose signal is violating operating regulations. The ARRL has falsely asserted that only bandwidth regulation should be used while proposing exceptions for the AM mode of operation. This should make it clear that a combination of bandwidth and digital and analog band management can work with little complication.

The ARRL’s assertion that “only its proposal” can bring the amateur radio community into the digital communications world is completely

unsubstantiated. The idea that any new communications capability can only progress if it is allowed across the total bandwidth of all of the amateur bands is simply another manifestation of the ARRL's mode of operation – demand.

The ARRL's senior management has confused “publishing” with “coordinating” and “demanding” with “leading strategic change.” The ARRL charges that the FCC

regulation process is too slow to keep up with today's rate of change, while it charges that the FCC's processes associated with BPL moves too fast.

I hope the FCC will study the ARRL proposal in the light of “assertions and demands.” FCC regulation of the amateur bands using a bandwidth approach can be combined with a minimal mode plan, which will allow the growth in digital communications usage while minimizing the unintended consequences of mixing the analog modes and the digital modes in the same segments of bandwidth (See my earlier comment). I urge the FCC to make significant changes in the ARRL's proposal to accomplish that end.